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tural power to cure is as to an existing fact and a promise to exercise this power in the future does not overthrow the consequences attached to the false representation.

Collision—Steamships in Harbor.—The Bowden v. The Decatur H. Miller, 78 Fed. Rep. 649. The obligation to use care in avoiding collisions is as incumbent upon a vessel lying in harbor and not under sail or steam as upon a moving vessel, and failure to warn approaching vessels of her helpless condition constitutes negligence. In this case the court also held that the approaching steamer, having failed to obtain answer to her signals, was bound to neglect no precaution to prevent risk of collision, even from the fault of the other vessel.

Divorce—Jurisdiction—Domicile.—Dickinson v. Dickinson, 45 N. E. Rep. 1091 (Mass.). A husband abandoned his wife, whom he had shortly before married under compulsion, and moved into another State. As soon as the statutory residence had been acquired there he applied for a divorce in that State, and the divorce was granted. The Massachusetts court holds that the fact of the abandonment and the early application for divorce, together with the circumstances of the marriage, warrant the inference that the husband's residence in the foreign State was not a *bona fide* one and that he went there purely for the purpose of obtaining a divorce. Therefore, that other State had no jurisdiction. *Looker v. Gerald*, 157 Mass. 42, 31 N. E. 709, distinguished.

Schools—Police Power—Power of State Board of Health—Compulsory Vaccination of Children—Delegation of Legislative Power.—State ex. rel. Adams v. Burdge et al., 70 N. W. Rep. 347. A statute authorizing a State board of health to make such regulations "as may in its judgment be necessary for the protection of the people," from contagious disease and leaving it to decide as to what diseases are contagious, is an unwarranted delegation of legislative power. In the absence of a statute making vaccination a condition precedent to the right to attend public schools, a rule to that effect by the board of health is unreasonable and cannot be sustained as an exercise of the police power of a State, being made when there is no danger of epidemic.